

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WISCONSIN**

Susan Miller, individually and as a  
representative of a class of similarly situated  
persons,

Plaintiff,

vs.

CenturyLink, Inc., a Louisiana corporation;  
CenturyLink Communications, LLC, a  
Delaware limited liability company;  
CenturyLink Public Communications, Inc., a  
Florida corporation; CenturyLink Sales  
Solutions, Inc., a Delaware corporation;  
Qwest Corporation, a Colorado corporation;  
and CenturyTel of Wisconsin, LLC, a  
Louisiana corporation,

Defendants.

Case No. 3:17-cv-00648-WMC

**DEFENDANTS' MOTION FOR A TEMPORARY STAY OF PROCEEDINGS  
PENDING RULING OF THE JUDICIAL PANEL ON MULTIDISTRICT LITIGATION**

Defendants CenturyLink, Inc., CenturyLink Communications, LLC, CenturyLink Public Communications, Inc., CenturyLink Sales Solutions, Inc. Qwest Corporation, and CenturyTel of Wisconsin, LLC (jointly “Defendants”), by and through their attorneys, respectfully move the Court to stay all proceedings (the “Motion for Stay”) pending a ruling by the Judicial Panel on Multidistrict Litigation (the “Panel”) on a motion, pursuant to 28 U.S.C. § 1407(a), filed by CenturyLink, Inc. and several of its subsidiaries, to transfer this case, and similar cases to a single transferee court (“Motion to Transfer”). Such stays are routinely granted during the pendency of a Motion to Transfer under § 1407. Here a stay of all proceedings is necessary and appropriate to achieve the judicial economies underlying § 1407. If a stay is not entered,

Defendants would face substantial prejudice due to the possibility of inconsistent rulings in multiple courts, and duplicative discovery and motions practice. In addition, a stay will conserve judicial resources and avoid burdening multiple federal judges with adjudicating virtually identical lawsuits.

The grounds for this Motion for Stay are set forth in the accompanying Memorandum of Law.

Counsel for Defendants represent they met and conferred with counsel for Plaintiffs, via telephone on September 12, 2017. Plaintiffs represented that they object to a stay of this lawsuit while the Motion to Transfer is pending.

Dated: September 18, 2017

Respectfully submitted,

s/ Michael D. Leffel

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